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November 17, 2023

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Carlos Mercado
23 Cr. 578 (PAC)

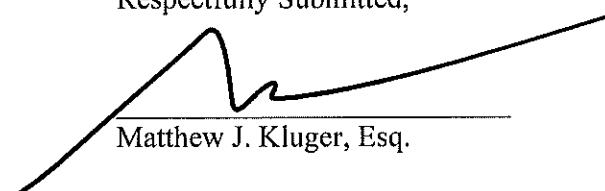
Dear Judge Crotty,

Bail in this matter was set on July 11, 2023. As a condition of Mr. Mercado's release, the Court imposed a curfew of 9pm to 6am, which is electronically monitored. Mr. Mercado has had no bail infractions to date. Last week, Mr. Mercado was hired at "Jersey Mike's Subs," a local fast-food restaurant. His shifts are generally expected to run from 5am to 3pm, or 3pm to 11pm. Accordingly, to allow Mr. Mercado to work (and travel to/from work), the defense respectfully requests that the Court modify the curfew to be from 12am to 5am.

I have communicated with Mr. Mercado's Pretrial Officer Michael Jones from the District of Connecticut, who has no objection to this request. Similarly, I have spoken to AUSA Jerry Fang who consents to this modification as well.

Thank you.

Respectfully Submitted,



Matthew J. Kluger, Esq.

cc: AUSA Jerry J. Fang
PTSO Michael Jones